

Notice of request for more information

The Environmental Permitting (England & Wales) Regulations 2016

Company Director / Company Secretary

Hadzor Court, Hadzor,
Droitwich,
Worcestershire,
United Kingdom,
WR9 7DR

Application number: EPR/JP3342YM/A001

The Environment Agency, in exercise of its powers under paragraph 4 of Part 1 of Schedule 5 of the above Regulations, requires you to provide the information detailed in the attached schedule. The information is required in order to determine your application for a permit duly made on 12/07/24.

Send the information to either the email or postal address below by 13/01/25. If we do not receive this information by the date specified then we may treat your application as having been withdrawn or it may be refused. If this happens you may lose your application fee.

Email address: Matthew.Tanner@environment-agency.gov.uk.

Postal address:

Permitting Support, NPS Sheffield
Quadrant 2
99 Parkway Avenue
Parkway Business Park
Sheffield
S9 4WF

Name	Date
Matt Tanner	18/12/2024

Authorised on behalf of the Environment Agency

Notes

These notes do not form part of this notice.

Please note that we charge £1,200 where we have to send a third or subsequent information notice in relation to the same issue. We consider this to be the first notice on the issues covered in this notice.

The notes in italics that appear after information requests in the attached schedule do not form part of the notice. The notes are intended to assist you in providing a full response.

Schedule

Dust Emissions Management Plan

1. Update the Dust Emissions Management Plan, addressing the following;

- a. Explain what the process is in place in order to prevent dust / mud travelling out of the site.

Item 1 of Table 5 gives some information on access and egress from site, but there is no commitment to inspect each lorry or to remove material from each lorry using a wheel wash or pressure washer. Cleaning the bellmouth entrance when dust/mud is present is not sufficient protection. Depending on the surface of the haul road, mud and dust will be picked up by lorries. Please include details of the actions taken to check that the cleaning has been sufficient.

Please note that if water-based cleaning is incorporated into your operating technique, you will need to review the water requirements (section 4.4 to 4.8) for the site.

- b. Provide the specification details of dust mitigation equipment, including bowser and manual dust suppression misting referenced in item 4 of Table 5.

We need to ensure the equipment proposed is sufficient to address the needs of the site, and confirm the water requirements of the equipment.

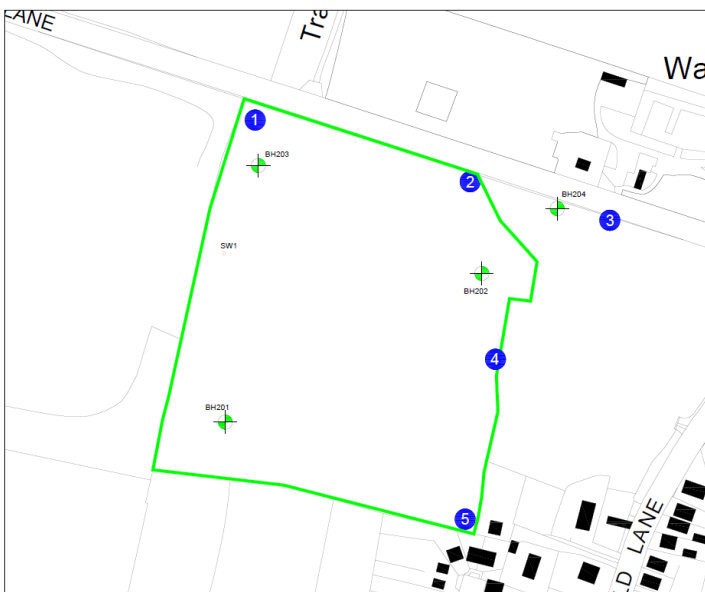
Please note that you should also provide the specification details of any wheel wash or dust suppression equipment which is to be incorporated in response to Q1(a) above.

- c. Confirm any replacement non-road going machinery will be Tier IIIb or Tier IV.

Section 3.6 states that new plant will be the lowest emission standard possible. Please amend this to confirm replacement machinery will be a minimum of Tier IIIB or Tier IV.

- d. Consider the suitability of the monitoring locations presented in 163407/D/006.

Point 5 is in the south-east corner of the site. It may be difficult to recognise dust leaving the site boundary. To appropriately monitor dust emissions leaving the site boundary towards receptors to the south-east of the site, would the operator consider adding a monitoring location on West End Gardens (outside the boundary of the site), when there is a north-westerly wind? There they can carry out the monitoring as specified in section 5 of the DEMP (e.g. inspection of static objects).



- e. Define the operational hours of the site.

Table 6 states that the water consumption calculations are based on a 10hour day. Other than that, the DEMP does not state when the site is in operation (i.e hours of the days, and days of the week). To understand how long the site is reliant on passive mitigation measures, the operational hours should be defined.

- f. To bring the DEMP in alignment with the rest of the application documents, confirm the volume required to infill the site, the annual deposition rate, and the expected lifetime of the fill operation.

The current version of the DEMP states that the landfilling will involve 'the importation of 426,900m3 of suitable inert waste, expected to take approximately 3 years to complete'. The application form states an importation of 472,200m3 (944,400 tonnes), with 200,000 tonnes per year – our calculations estimate this to take 5 years. Either correct the DEMP to align with the rest of the application documents, or we will need other documents revised to align with the DEMP.

Environmental Management System Summary

2. Update the Environmental Management System Summary to show commitment that the EMS includes all aspects covered under the guidance, Develop a management system: environmental permits - GOV.UK, most notably;
 - Acknowledging specific accidents, such as equipment breakdowns, flooding and vandalism.
 - Contingency plans for minimising the impact on the environment from accidents.
 - Integrate Climate Change Adaptation Planning.

TCM certificate

3. Provide a Continuing competency certificate for Henry Austin, or a suitable alternative.

The Continuing Competency certificate provided has expired.